

in response to approximately 227 fraudulent warranty claims that sought to obtain computer hardware with a retail value of approximately \$600,000.

19. Defendant JUSTIN DAVID MAY and one or more co-schemers unknown to the grand jury tracked the shipment of the Microsoft computer hardware through UPS and FedEx.

20. Defendant JUSTIN DAVID MAY traveled from his residence in the District of Delaware to the locations to which Microsoft had shipped the computer hardware, including locations in the Eastern District of Pennsylvania.

21. Defendant JUSTIN DAVID MAY obtained the Microsoft computer hardware from the locations to which it had been shipped, including from locations in the Eastern District of Pennsylvania, by posing as the intended recipient.

22. Defendant JUSTIN DAVID MAY travelled with the fraudulent-obtained Microsoft computer hardware across state lines, including from the Eastern District of Pennsylvania to his residence in the District of Delaware.

23. Defendant JUSTIN DAVID MAY and his co-schemers ignored Microsoft's repeated communications seeking the return of the supposedly faulty computer hardware, and did not return any computer hardware to Microsoft, because defendant MAY and his co-schemers had never owned the supposedly faulty computer hardware in the first place.

24. Defendant JUSTIN DAVID MAY sold some of the Microsoft computer hardware he obtained in this manner via eBay.

25. Defendant JUSTIN DAVID MAY shipped some of the Microsoft computer hardware he had obtained in this manner to a co-schemer located in Singapore

**MAIL FRAUD**

26. On or about each of the following dates, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, defendant

**JUSTIN DAVID MAY**

alone and with one or more co-schemers unknown to the grand jury, for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be delivered by mail and commercial interstate carriers, according to the directions thereon, the following items:

<b>COUNT</b>	<b>DATE</b>	<b>FROM</b>	<b>TO</b>	<b>DESCRIPTION OF ITEM</b>
SIXTEEN	August 3, 2017	Louisville, Kentucky	Wilmington, Delaware	Microsoft Surface device, shipped via FedEx, tracking # 741512347253, in response to Microsoft SR # 1393747451
SEVENTEEN	October 4, 2017	Louisville, Kentucky	Springfield, Pennsylvania	Microsoft Surface device, shipped via UPS, tracking # 1ZY549V70358522972, in response to Microsoft SR # 1399778766
EIGHTEEN	October 20, 2017	Louisville, Kentucky	Springfield, Pennsylvania	Microsoft Surface device, shipped via UPS, tracking # 1ZY549V70359184934, in response to Microsoft SR # 1401823364
NINETEEN	November 3, 2017	Louisville, Kentucky	Springfield, Pennsylvania	Microsoft Surface device, shipped via UPS, tracking # 1ZY549V70359968516, in response to Microsoft SRs # 1399800189 and 1403129284

COUNT	DATE	FROM	TO	DESCRIPTION OF ITEM
TWENTY	November 3, 2017	Louisville, Kentucky	Springfield, Pennsylvania	Microsoft Surface device, shipped via UPS, tracking # 1ZY549V70359968472, in response to Microsoft SRs # 1399800401 and 1403129577
TWENTY-ONE	November 4, 2017	Louisville, Kentucky	Springfield, Pennsylvania	Microsoft Surface device, shipped via UPS, tracking # 1ZY549V70360037233, in response to Microsoft SRs # 1399800562 and 1403260598
TWENTY-TWO	November 4, 2017	Louisville, Kentucky	Springfield, Pennsylvania	Microsoft Surface device, shipped via UPS, tracking # 1ZY549V70360037199, in response to Microsoft SRs # 1399800718 and 1403260676
TWENTY-THREE	September 14, 2017	Wilmington, Delaware	Simei, Singapore	Four Microsoft Surface devices, shipped via FedEx, tracking # 787733132630
TWENTY-FOUR	September 27, 2017	Wilmington, Delaware	Simei, Singapore	Eighteen Microsoft Surface devices, shipped via FedEx, tracking # 787880018918

All in violation of Title 18, United States Code, Sections 1341, 3559(g), and 2.



**COUNTS TWENTY-FIVE THROUGH FORTY****THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about the dates set forth below, in Boothwyn, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JUSTIN DAVID MAY**

knowingly conducted the following financial transactions affecting interstate commerce:

<b>COUNT</b>	<b>DATE</b>	<b>DESCRIPTION</b>
TWENTY-FIVE	June 21, 2016	Cashed check at Boothwyn Check Cashing, check number 2343 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$7,000, and received approximately \$6,860 cash.
TWENTY-SIX	July 28, 2016	Cashed check at Boothwyn Check Cashing, check number 2381 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$7,200, and received approximately \$7,056 cash.
TWENTY-SEVEN	August 31, 2016	Cashed check at Boothwyn Check Cashing, check number 2407 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$11,000, and received approximately \$10,780 cash.
TWENTY-EIGHT	September 13, 2016	Cashed check at Boothwyn Check Cashing, check number 2415 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$12,600, and received approximately \$12,348 cash.
TWENTY-NINE	October 13, 2016	Cashed check at Boothwyn Check Cashing, check number 2443 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$20,000, and received approximately \$19,600 cash.
THIRTY	October 26, 2016	Cashed check at Boothwyn Check Cashing, check number 2455 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$15,000, and received approximately \$14,700 cash.
THIRTY-ONE	November 25, 2016	Cashed check at Boothwyn Check Cashing, check number 2481 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$12,000, and received approximately \$11,760 cash.

COUNT	DATE	DESCRIPTION
THIRTY-TWO	December 1, 2016	Cashed check at Boothwyn Check Cashing, check number 2490 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$10,000, and received approximately \$9,800 cash.
THIRTY-THREE	December 17, 2016	Cashed check at Boothwyn Check Cashing, check number 2507 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$9,300, and received approximately \$9,114 cash.
THIRTY-FOUR	January 12, 2017	Cashed check at Boothwyn Check Cashing, check number 2527 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$10,000, and received approximately \$9,800 cash.
THIRTY-FIVE	January 18, 2017	Cashed check at Boothwyn Check Cashing, check number 2533 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$16,000, and received approximately \$15,680 cash.
THIRTY-SIX	February 8, 2017	Cashed check at Boothwyn Check Cashing, check number 2547 from Chase Bank account of Computechsale LLC ending in 2985 in the amount of \$4,000, and received approximately \$3,920 cash.
THIRTY-SEVEN	February 15, 2017	Cashed check at Boothwyn Check Cashing, check number 1229 from Bank of America account of Softnetworks LLC ending in 5747 in the amount of \$5,100, and received approximately \$5,010.75 cash.
THIRTY-EIGHT	March 1, 2017	Cashed check at Boothwyn Check Cashing, check number 1233 from Bank of America account of Softnetworks LLC ending in 5747 in the amount of \$5,200, and received approximately \$5,109 cash.
THIRTY-NINE	March 9, 2017	Cashed check at Boothwyn Check Cashing, check number 1237 from Bank of America account of Softnetworks LLC ending in 5747 in the amount of \$5,400, and received approximately \$5,305.50 cash.
FORTY	March 23, 2017	Cashed check at Boothwyn Check Cashing, check number 1241 from Bank of America account of Softnetworks LLC ending in 5747 in the amount of \$7,300, and received approximately \$7,172.25 cash.

3. When conducting the financial transactions described in paragraph 2 above, defendant JUSTIN DAVID MAY knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Section 1341, and defendant JUSTIN DAVID MAY acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).



**COUNTS FORTY-ONE THROUGH FORTY-THREE****THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. Paragraphs 1 through 25 of Count Two are incorporated here.
3. On or about each of the following dates, in the Eastern District of

Pennsylvania and elsewhere, defendant

**JUSTIN DAVID MAY**

did unlawfully transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate and foreign commerce, from the state of Pennsylvania to the State of Delaware, the following goods, wares, and merchandise, each of a value of \$5,000 or more, knowing the same to have been taken by fraud.

<b>COUNT</b>	<b>DATE</b>	<b>FROM</b>	<b>TO</b>	<b>DESCRIPTION OF ITEM(S)</b>
FORTY-ONE	April 1, 2017	Philadelphia, Pennsylvania	Wilmington, Delaware	One Cisco Model # WS-C3850-48UW-S, retail value approximately \$14,500, previously shipped from Texas to Nevada via FedEx, tracking # 725509278820, and one Cisco Model # WS-C3850-48U-S, retail value approximately \$14,000, previously shipped from Texas to Nevada via FedEx, tracking # 725509279919
FORTY-TWO	November 7, 2017	Springfield, Pennsylvania	Wilmington, Delaware	Two Microsoft Surface devices, shipped from Tennessee to Pennsylvania via UPS, tracking #s 1ZY549V70359968516 and 1ZY549V70359968472, respectively, with a combined retail value of approximately \$5,400

COUNT	DATE	FROM	TO	DESCRIPTION OF ITEM(S)
FORTY-THREE	November 8, 2017	Springfield, Pennsylvania	Wilmington, Delaware	Two Microsoft Surface devices, shipped from Tennessee to Pennsylvania via UPS, tracking #s 1Z7549V70360037233 and 1Z7549V70360037199, respectively, with a combined retail value of approximately \$5,400

All in violation of Title 18, United States Code, Section 2314.



**COUNT FORTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. During calendar year 2015, defendant JUSTIN DAVID MAY had no legitimate job.
2. During calendar year 2015, defendant JUSTIN DAVID MAY earned substantial income from various fraud schemes in furtherance of which defendant MAY defrauded merchants into providing him with merchandise to which he was not lawfully entitled, and then selling that merchandise on eBay, Craigslist, and to third-party resellers.
3. During calendar year 2015, defendant JUSTIN DAVID MAY received gross income of at least approximately \$26,071. Defendant MAY's gross income for 2015 exceeded the threshold required for filing either an individual income tax return with the IRS.
4. On this gross income, defendant JUSTIN DAVID MAY owed to the United States of America federal income tax of at least approximately \$1,905.
5. From in or about January 1, 2014 through in or about April 2015, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, defendant

**JUSTIN DAVID MAY**

a resident of the Wilmington, Delaware, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2015 by failing to make an income tax return on or about April 15, 2016, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other

thing:

- a. by failing to file a federal income tax return with the IRS for calendar year 2015 and failing to report the income he received during 2015;
- b. by converting checks and money orders he received from his scheme to defraud various merchants into cash by cashing them at a check cashing business;
- c. by storing at his residence large amounts of cash obtained through fraud;
- d. by using cash to pay his personal living expenses;
- e. by using false email addresses and names to conceal his involvement in the schemes to defraud.

All in violation of Title 26, United States Code, Section 7201.

**COUNT FORTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 46 of Count One are incorporated here.
2. During calendar year 2016, defendant JUSTIN DAVID MAY received gross income of approximately \$213,570. Defendant MAY's gross income for 2016 exceeded the threshold required for filing either an individual income tax return with the IRS.
3. On this gross income, defendant JUSTIN DAVID MAY owed to the United States of America federal income tax of at least approximately \$50,592.
4. From in or about January 1, 2015 through in or about April 2016, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, defendant

**JUSTIN DAVID MAY**

a resident of the Wilmington, Delaware, willfully attempted to evade and defeat an income tax due and owing by him to the United States of America for the calendar year 2016 by failing to make an income tax return on or about April 15, 2017, as required by law, to any proper officer of the Internal Revenue Service, and by failing to pay to the Internal Revenue Service this income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income through various means, including, among other thing:

- a. by failing to file a federal income tax return with the IRS for calendar year 2016 and failing to report the income he received during 2016;
- b. by converting the checks he received from his scheme to defraud Cisco as charged in Count One into cash by cashing them at a check cashing business;
- c. by storing at his residence large amounts of cash obtained through



the scheme to defraud Cisco as charged in Count One;

- d. by using cash to pay his personal living expenses;
- e. by using false email addresses and names to conceal his

involvement in a scheme to defraud Cisco as charged in Count One.

All in violation of Title 26, United States Code, Section 7201.

**NOTICE OF FORFEITURE No. 1**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 1341 and 2314 set forth in this indictment, defendant

**JUSTIN DAVID MAY**

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$2,506,196 in United States currency (money judgment).

2. If any of the property described above, as a result of any actor omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and 28 U.S.C. Section 2461.

**NOTICE OF FORFEITURE No. 2**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1956 set forth in this indictment, defendant

**JUSTIN DAVID MAY**

shall forfeit to the United States of America any property, real or personal, involved in such offense, or any property traceable to such property, including but not limited to \$231,200 in United States currency (money judgment).

2. If any of the property described above, as a result of any actor omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

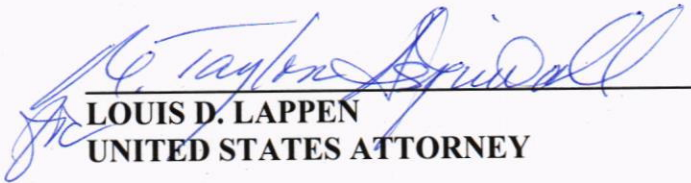
it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.



All pursuant to Title 18, United States Code, Section 982(a)(1).

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

  
**LOUIS D. LAPPEN**  
**UNITED STATES ATTORNEY**